

EXHIBIT B

EXHIBIT B – Blitzsafe’s Proposed Constructions

Patent Rule 4-3 Joint Claim Construction Chart

No.	Claim Term/Phrase	Patent/Claims	Blitzsafe’s Proposed Construction	Intrinsic Support ¹	Extrinsic Support
1.	“integration subsystem”	’342: 49, 50, 53, 54, 55, 56, 57, 66, 70, 73, 77, 78, 79, 80, 97, 99, 102, 103, 106, 113, 120	Not subject to 35 U.S.C. § 112(6) (pre-AIA). “a subsystem that includes a microcontroller configured to integrate an external device with a car audio/video system”	’342 Patent, Abstract; Figs. 3A–D, 4A–G, 10–24 and accompanying descriptions; 1:19–28; 2:8–11, 44–54;2:58–3:3; 5:7–15, 19–29, 53–54; 8:64–9:7; 12:58–16:29; 16:40–24:47; 25:40–47; 27:26–34, 37–41; 27:65– 34:48–54; 27:35–28:1; 28:7–38:48. 11/475,847, Response to Office Action dated Nov. 30, 2009 at 31–36; Notice of Allowance dated Feb. 16, 2012. 10/316,961, Response to Office Action dated June 5, 2006, at 21–23, 25, 27; Response to Office Action dated November 14, 2006, at 26–36; Response to Office Action / Request for Continued Examination dated June 28, 2006, at 26–38; Response to Office Action dated July 12, 2007 at 29, 34–37; Notice of Allowance dated	Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein. Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 146, in <i>Blitzsafe Texas, LLC v. Honda Motor Co., Ltd., et al.</i> , Case No. 2:15-cv-1274-JRG-RSP, as well as all briefing and evidence referred to therein. Blitzsafe may rely on the expert testimony of Mr. Joseph McAlexander in connection with this claim term.

¹ Blitzsafe expressly reserves the right to rely upon all intrinsic support cited for the ’786 Patent as extrinsic evidence for the ’342 Patent.

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				July 31, 2008.	
2.	"interface"	'786: 1, 5, 6, 10, 14, 23, 57, 64, 86, 88, 92, 97	“a device that includes a microcontroller and that is a functionally and structurally separate component from the car stereo, which integrates an external aftermarket device with a car stereo”	<p>'786 Patent, Figs 1, 2A–2C, 2E–2H and accompanying descriptions; 2:50–52; 4:46–56, 59–67; 5:14–24, 27–37; 5:38–55; 6:1–15; 6:25–33; 7:10–13.</p> <p>10/316,961, Response to Office Action dated June 5, 2006 at 21-23; 10/316,961, Response to Office Action dated Nov. 14, 2006 at 26-36; 10/316,961, Response to Office Action / Request for Continued Examination dated June 28, 2006 at 26-38; 10/316,961, Response to Office Action dated July 12, 2007 at 29-37; 10/316,961, Response to Office Action / Request for Continued Examination dated Feb. April 21, 2008 at 29-34; Notice of Allowance dated July 31, 2008.</p> <p>'342 Patent, Figs. 1–2H, 9–11A, 12A, 13A–13B, 15, 17–23, and accompanying descriptions; 3:21–24; 3:44–5:19; 9:10–16, 41–63; 9:64–11:25, 11:53–12:31;12:60–64; 13:55–58; 28:7–25; 34:9–18; 35:28–32.</p>	<p>Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i>, Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein.</p> <p>Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 146, in <i>Blitzsafe Texas, LLC v. Honda Motor Co., Ltd., et al.</i>, Case No. 2:15-cv-1274-JRG-RSP, as well as all briefing and evidence referred to therein.</p> <p>Blitzsafe may rely on the expert testimony of Mr. Joseph McAlexander in connection with this claim term.</p>

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				11/475,847, Response to Office Action dated Nov. 30, 2009, at 31–33, 35; Response to Office Action dated Jan. 29, 2012 at 32; Notice of Allowance dated Feb. 16, 2012.	
3.	"formatted command" / "formatted control command" / "formatted control signal"	'786: 1, 57, 90, 92 '342: 53, 57, 97	Plain and ordinary meaning	'786 Patent, Abstract, FIGS. 4A, 4B, 4C, 1:37-44; 1:60-2:11; 2:35-40; 4:59-64; 5:45-55; 6:11-24; 6:33-43; 9:45-67; 11:30-46; 12:50-67; 13:22-47; 14:3-31; 17:22-18:62.	Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein. Blitzsafe may rely on the expert testimony of Mr. Joseph McAlexander in connection with this claim term.
4.	"after-market audio device" and "after-market video device"	'786: 1, 4, 5, 7, 8, 10, 23, 26, 86	“[audio/video] equipment lacking the specifically designed wiring harness configured for use with the custom designed connectors positioned throughout the vehicle.”	'786 Patent, Abstract; 1:7-12; 1:25-30; 1:37-44; 2:22-29; 5:17-19. '786 Patent, 1:7–12; 1:25–35; 1:37–2:18; 2:22–29; 2:43–46, 2:50–60; 4:47–52, 4:59–67; 5:17–19; 8:22–27; 17:22–26; 18:5–10; 18:67–19:3; 19:7–11; 20:44–47.	Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein. Blitzsafe may rely on the expert testimony of Mr. Joseph

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No.	Claim Term/Phrase	Patent/Claims	Blitzsafe’s Proposed Construction	Intrinsic Support ¹	Extrinsic Support
				10/316,961, Response to Office Action dated June 5, 2006 at 21–30; Response to Office Action dated November 14, 2006, at 26, 27, 29–35; Response to Office Action dated November 14, 2006, at 26–36; Response to Office Action dated June 28, 2007, at 35-36; Response to Office Action dated July 12, 2007, at 29–30, 32–36; Response to Office Action / Request for Continued Examination dated February April 21, 2008, at 31; Notice of Allowance dated July 31, 2008. 11/475,847, Response to Office Action, dated Nov. 30, 2009, at 31–25; Response to Office Action dated Jan. 29, 2012, at 28–39; Notice of Allowance dated Feb. 16, 2012.	McAlexander in connection with this claim term.
5.	"generated by the portable device over the [or said] wireless communication link for playing on the car audio/video system"	'342: 49, 66, 73, 94	“produced by the portable device, and received by the integration subsystem, as decoded audio signals for playing on the car audio/video system”	'342 Patent, 1:58–50; 9:10–16; 26:21–26; 34:32–59; 35:56–65; 38:25–40. 10/316,961, Response to Office Action dated June 5, 2006, at 21,	Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence

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				<p>25, 26, 28, 30; Response to Office Action dated July 12, 2007, at 33; Notice of Allowance dated July 31, 2008.</p> <p>11/475,847, Response to Office Action dated Nov. 11, 2009, at 32–33, 35; Response to Office Action dated Jan. 29, 2012, at 33, 35, 37–39; Notice of Allowance dated Feb. 16, 2012.</p> <p>IPR No. 2016-00118, Paper No. 19, at 18-22, 28-31, and all briefing, declarations, and exhibits cited therein.</p> <p>IPR No. 2016-00418, Paper No. 13, at 28-33, and all briefing, declarations, and exhibits cited therein.</p> <p>IPR No. 2016-00419, Paper No. 13, at 23, 25-30, and all briefing, declarations, and exhibits cited therein.</p> <p>IPR No. 2016-01473, Paper No. 9,</p>	<p>referred to therein.</p> <p>Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 146, in <i>Blitzsafe Texas, LLC v. Honda Motor Co., Ltd., et al.</i>, Case No. 2:15-cv-1274-JRG-RSP, as well as all briefing and evidence referred to therein.</p> <p>Blitzsafe may rely on the expert testimony of Mr. Joseph McAlexander in connection with this claim term.</p>

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				at 14-15, 18, 22, and all briefing, declarations, and exhibits cited therein. IPR No. 2016-01476, Paper No. 12, at 11-12, 15-24, 33, and all briefing, declarations, and exhibits cited therein. IPR No. 2018-00090, Paper No. 15, at 8-11, 18-24, and all briefing, declarations, and exhibits cited therein.	
6.	"generated by the portable device to the car audio/video system using the wireless communication link"	'342: 97 120	“produced by the portable device, and received by the integration subsystem, as decoded audio signals for playing on the car audio/video system”	'342 Patent, 1:58–50; 9:10–16; 26:21–26; 34:32–59; 35:56–65; 38:25–40. 10/316,961, Response to Office Action dated June 5, 2006, at 21, 25, 26, 28, 30; Response to Office Action dated July 12, 2007, at 33; Notice of Allowance dated July 31, 2008. 11/475,847, Response to Office Action dated Nov. 11, 2009, at 32–33, 35; Response to Office Action	Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein. Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 146, in <i>Blitzsafe Texas, LLC v. Honda Motor Co., Ltd., et al.</i> , Case No. 2:15-cv-1274-JRG-RSP, as well as all briefing and evidence referred to therein.

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				<p>dated Jan. 29, 2012, at 33, 35, 37–39; Notice of Allowance dated Feb. 16, 2012.</p> <p>IPR No. 2016-00118, Paper No. 19, at 18-22, 28-31, and all briefing, declarations, and exhibits cited therein.</p> <p>IPR No. 2016-00418, Paper No. 13, at 28-33, and all briefing, declarations, and exhibits cited therein.</p> <p>IPR No. 2016-00419, Paper No. 13, at 23, 25-30, and all briefing, declarations, and exhibits cited therein.</p> <p>IPR No. 2016-01473, Paper No. 9, at 14-15, 18, 22, and all briefing, declarations, and exhibits cited therein.</p> <p>IPR No. 2016-01476, Paper No. 12, at 11-12, 15-24, 33, and all briefing, declarations, and exhibits cited therein.</p>	<p>Blitzsafe may rely on the expert testimony of Mr. Joseph McAlexander in connection with this claim term.</p>

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				IPR No. 2018-00090, Paper No. 15, at 8-11, 18-24, and all briefing, declarations, and exhibits cited therein.	
7.	"a first pre-programmed code portion for remotely controlling the after-market audio device using the car stereo by receiving a control command from the car stereo through said first connector in a format incompatible with the after-market audio device, processing the received control command into a formatted command compatible with the after-market audio device, and transmitting the formatted command to the after-market audio device through said second connector for execution by the	'786: 1	<p>Not subject to 35 U.S.C. § 112, ¶ 6.</p> <p>Plain and ordinary meaning</p> <p>If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants’ recitation of the function(s) of this term, and identifies the following exemplary “structure(s), act(s), or material(s)” that may correspond to this term:</p> <p>the interface including a microcontroller, resistors, diodes, capacitors, oscillators and connectors shown in Figures 3A-3D, executing the algorithms shown in Figures 4A-4C and described at 12:15-14:31, and the algorithm described at 17:22-18:4, and equivalents thereof.</p>	<p>'786 Patent, Figs 1, 2A–2C, 2E–2H, 3A-3D, 4A-4G and accompanying descriptions; 2:50–52; 4:46–56, 59–67; 5:14–24, 27–37; 5:38–55; 6:1–15; 6:25–33; 7:10–13; 8:65–19:60.</p> <p>10/316,961, Response to Office Action dated June 5, 2006 at 21-23; 10/316,961, Response to Office Action dated Nov. 14, 2006 at 26-36;</p> <p>10/316,961, Response to Office Action / Request for Continued Examination dated June 28, 2006 at 26-38; 10/316,961, Response to Office Action dated July 12, 2007 at 29-37;</p> <p>10/316,961, Response to Office Action / Request for Continued Examination dated Feb. April 21,</p>	<p>Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i>, Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein.</p> <p>Blitzsafe may rely on the expert testimony of Mr. Joseph McAlexander in connection with this claim term.</p>

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	after-market audio device"			2008 at 29-34; Notice of Allowance dated July 31, 2008	
8.	"a first pre-programmed code portion for generating a device presence signal and transmitting the signal to the car stereo to maintain the car stereo in an operational state" "a first pre-programmed code portion for generating a device presence signal and transmitting the signal to the car stereo through said first electrical connector to maintain the car stereo in an operational state responsive to signals generated by the after-market video device"	'786: 57, 86 '786: 86	Not subject to 35 U.S.C. § 112, ¶ 6. Plain and ordinary meaning If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants’ recitation of the function(s) of this term, and identifies the following exemplary “structure(s), act(s), or material(s)” that may correspond to this term: the interface including a microcontroller, resistors, diodes, capacitors, oscillators and connectors shown in Figures 3A-3D, executing the algorithms shown in Figures 4A-4G and described at 12:15-17:21, and equivalents thereof.	'786 Patent, Figs 1, 2A–2C, 2E–2H, 3A-3D, 4A-4G and accompanying descriptions; 2:50–52; 4:46–56, 59–67; 5:14–24, 27–37; 5:38–55; 6:1–15; 6:25–33; 7:10–13; 8:65–19:60. 10/316,961, Response to Office Action dated June 5, 2006 at 21-23; 10/316,961, Response to Office Action dated Nov. 14, 2006 at 26-36; 10/316,961, Response to Office Action / Request for Continued Examination dated June 28, 2006 at 26-38; 10/316,961, Response to Office Action dated July 12, 2007 at 29-37; 10/316,961, Response to Office Action / Request for Continued Examination dated Feb. April 21, 2008 at 29-34; Notice of Allowance dated July 31, 2008	Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein. Blitzsafe may rely on the expert testimony of Mr. Joseph McAlexander in connection with this claim term.

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9.	"a second pre-programmed code portion for receiving data from the after-market audio device through said second connector in a format incompatible with the car stereo, processing the received data into formatted data compatible with the car stereo, and transmitting the formatted data to the car stereo through said first connector for display by the car stereo"	'786: 1	<p>Not subject to 35 U.S.C. § 112, ¶ 6.</p> <p>Plain and ordinary meaning</p> <p>If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants’ recitation of the function(s) of this term, and identifies the following exemplary “structure(s), act(s), or material(s)” that may correspond to this term:</p> <p>the interface including a microcontroller, resistors, diodes, capacitors, oscillators and connectors shown in Figures 3A-3D, executing the algorithms shown in Figures 4A-4G and described at 12:15-17:21, and the algorithm described at 18:5-61, and equivalents thereof.</p>	<p>'786 Patent, Figs 1, 2A–2C, 2E–2H, 3A-3D, 4A-4G and accompanying descriptions; 2:50–52; 4:46–56, 59–67; 5:14–24, 27–37; 5:38–55; 6:1–15; 6:25–33; 7:10–13; 8:65–19:60.</p> <p>10/316,961, Response to Office Action dated June 5, 2006 at 21-23; 10/316,961, Response to Office Action dated Nov. 14, 2006 at 26-36;</p> <p>10/316,961, Response to Office Action / Request for Continued Examination dated June 28, 2006 at 26-38; 10/316,961, Response to Office Action dated July 12, 2007 at 29-37;</p> <p>10/316,961, Response to Office Action / Request for Continued Examination dated Feb. April 21, 2008 at 29-34; Notice of Allowance dated July 31, 2008</p>	<p>Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i>, Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein.</p> <p>Blitzsafe may rely on the expert testimony of Mr. Joseph McAlexander in connection with this claim term.</p>
10.	"a third code portion for receiving data from the video device incompatible with the car stereo, processing	'786: 91	<p>Not subject to 35 U.S.C. § 112, ¶ 6.</p> <p>Plain and ordinary meaning</p> <p>If the Court determines that this</p>	<p>'786 Patent, Figs 1, 2A–2C, 2E–2H, 3A-3D, 4A-4G and accompanying descriptions; 2:50–52; 4:46–56, 59–67; 5:14–24, 27–37; 5:38–55; 6:1–15; 6:25–33; 7:10–13; 8:65–19:60.</p>	<p>Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i>, Case No. 2:17-cv-00421-JRG-RSP, as well</p>

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	received data into formatted data compatible with the car stereo, and transmitting formatted data ... "		term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants’ recitation of the function(s) of this term, and identifies the following exemplary “structure(s), act(s), or material(s)” that may correspond to this term: the interface including a microcontroller, resistors, diodes, capacitors, oscillators and connectors shown in Figures 3A-3D, executing the algorithms shown in Figures 4A-4G and described at 12:15-17:21, and the algorithm described at 18:5-61, and equivalents thereof. (same as previous)	10/316,961, Response to Office Action dated June 5, 2006 at 21-23; 10/316,961, Response to Office Action dated Nov. 14, 2006 at 26-36; 10/316,961, Response to Office Action / Request for Continued Examination dated June 28, 2006 at 26-38; 10/316,961, Response to Office Action dated July 12, 2007 at 29-37; 10/316,961, Response to Office Action / Request for Continued Examination dated Feb. April 21, 2008 at 29-34; Notice of Allowance dated July 31, 2008	as all briefing and evidence referred to therein. Blitzsafe may rely on the expert testimony of Mr. Joseph McAlexander in connection with this claim term.
11.	"a second pre-programmed code portion for remotely controlling the MP3 player using the car stereo by receiving a control command from the car stereo through said first electrical connector in a format	’786: 1	Not subject to 35 U.S.C. § 112, ¶ 6. Plain and ordinary meaning If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants’ recitation of the function(s) of this term, and identifies the following	’786 Patent, Figs 1, 2A–2C, 2E–2H, 3A-3D, 4A-4G and accompanying descriptions; 2:50–52; 4:46–56, 59–67; 5:14–24, 27–37; 5:38–55; 6:1–15; 6:25–33; 7:10–13; 8:65–19:60. 10/316,961, Response to Office Action dated June 5, 2006 at 21-23; 10/316,961, Response to Office Action dated Nov. 14, 2006 at 26-	Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein. Blitzsafe may rely on the expert

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	incompatible with the MP3 player, processing the control command into a formatted control command compatible with the MP3 player, and transmitting the formatted control command to the MP3 player through said second electrical connector for execution by the MP3 player"		exemplary “structure(s), act(s), or material(s)” that may correspond to this term: the interface including a microcontroller, resistors, diodes, capacitors, oscillators and connectors shown in Figures 3A-3D, executing the algorithms shown in Figure 4B and described at 13:1-48, and the algorithm described at 17:22-18:4, and equivalents thereof.	36; 10/316,961, Response to Office Action / Request for Continued Examination dated June 28, 2006 at 26-38; 10/316,961, Response to Office Action dated July 12, 2007 at 29-37; 10/316,961, Response to Office Action / Request for Continued Examination dated Feb. April 21, 2008 at 29-34; Notice of Allowance dated July 31, 2008	testimony of Mr. Joseph McAlexander in connection with this claim term.
12.	"a third pre-programmed code portion for switching to one or more auxiliary input sources connected to said third electrical connector"	’786: 1	Not subject to 35 U.S.C. § 112, ¶ 6. Plain and ordinary meaning If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants’ recitation of the function(s) of this term, and identifies the following exemplary “structure(s), act(s), or material(s)” that may correspond to this term: a microprocessor programmed to execute the flow-diagram of ref.	’786 Patent, Figs 1, 2A–2C, 2E–2H, 3A-3D, 4A-4G and accompanying descriptions; 2:50–52; 4:46–56, 59–67; 5:14–24, 27–37; 5:38–55; 6:1–15; 6:25–33; 7:10–13; 8:65–19:60. 10/316,961, Response to Office Action dated June 5, 2006 at 21-23; 10/316,961, Response to Office Action dated Nov. 14, 2006 at 26-36; 10/316,961, Response to Office Action / Request for Continued Examination dated June 28, 2006 at 26-38; 10/316,961, Response to	Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein. Blitzsafe may rely on the expert testimony of Mr. Joseph McAlexander in connection with this claim term.

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			no. 198 of Fig. 4D as described in col. 14:43-48, 15:13-23, and 316 of Fig. 5 as described in col. 19:48-52. (agreed)	Office Action dated July 12, 2007 at 29-37; 10/316,961, Response to Office Action / Request for Continued Examination dated Feb. April 21, 2008 at 29-34; Notice of Allowance dated July 31, 2008	
13.	"video information"	'786: 10, 86	“Visual images”	'786 Patent, 2:22-52, 8:22-27; 20:44-54. 10/316,961, Response to Office Action dated November 14, 2006 at 26-30; 10/316,961, Response to Office Action dated July 12, 2007 at 34-35.	Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein. Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 146, in <i>Blitzsafe Texas, LLC v. Honda Motor Co., Ltd., et al.</i> , Case No. 2:15-cv-1274-JRG-RSP, as well as all briefing and evidence referred to therein. Blitzsafe may rely on the expert testimony of Mr. Joseph McAlexander in connection with this claim term.

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14.	"connector electrically connectable to" / "electrical connector"	'786: 1, 2, 4, 5, 57, 86, 97	Plain and ordinary meaning	'786 patent, Figs. 3A, 3C–3D; 8:37–39, 49–59; 9:8–60; 10:19–48; 11:21–46, 59–12:3. 10/316,961, Response to Office Action dated June 5, 2006, at 21–30; Response to Office Action dated November 14, 2006, at 29; Response to Office Action / Request for Continued Examination dated June 28, 2006, at 27–29, 31–37; Response to Office Action, dated July 12, 2007 at 29–36.	Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein. Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 146, in <i>Blitzsafe Texas, LLC v. Honda Motor Co., Ltd., et al.</i> , Case No. 2:15-cv-1274-JRG-RSP, as well as all briefing and evidence referred to therein. Blitzsafe may rely on the expert testimony of Mr. Joseph McAlexander in connection with this claim term.
15.	"a second code portion for receiving a control signal from the car ..., processing a received control signal ... ,and transmitting the formatted control signal... "	'786: 90	Not subject to 35 U.S.C. § 112, ¶ 6. Plain and ordinary meaning If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants’ recitation of the function(s) of this term, and	'786 Patent, Figs 1, 2A–2C, 2E–2H, 3A-3D, 4A-4G and accompanying descriptions; 2:50–52; 4:46–56, 59–67; 5:14–24, 27–37; 5:38–55; 6:1–15; 6:25–33; 7:10–13; 8:65–19:60. 10/316,961, Response to Office Action dated June 5, 2006 at 21-23; 10/316,961, Response to Office	Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein. Blitzsafe may rely on the expert

EXHIBIT B – Blitzsafe’s Proposed Constructions

Patent Rule 4-3 Joint Claim Construction Chart

No.	Claim Term/Phrase	Patent/Claims	Blitzsafe’s Proposed Construction	Intrinsic Support ¹	Extrinsic Support
			identifies the following exemplary “structure(s), act(s), or material(s)” that may correspond to this term: the interface including a microcontroller, resistors, diodes, capacitors, oscillators and connectors shown in Figures 3A-3D, executing the algorithms shown in Figures 4A-4C and described at 12:15-14:31, and the algorithm described at 17:22-18:4, and equivalents thereof.	Action dated Nov. 14, 2006 at 26-36; 10/316,961, Response to Office Action / Request for Continued Examination dated June 28, 2006 at 26-38; 10/316,961, Response to Office Action dated July 12, 2007 at 29-37; 10/316,961, Response to Office Action / Request for Continued Examination dated Feb. April 21, 2008 at 29-34; Notice of Allowance dated July 31, 2008	testimony of Mr. Joseph McAlexander in connection with this claim term.
16.	"a third code portion for receiving data from the MP3 player ..., processing received data ..., and transmitting formatted data ... "	’786: 60	Not subject to 35 U.S.C. § 112, ¶ 6. Plain and ordinary meaning If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants’ recitation of the function(s) of this term, and identifies the following exemplary “structure(s), act(s), or material(s)” that may correspond to this term: the interface including a	’786 Patent, Figs 1, 2A–2C, 2E–2H, 3A-3D, 4A-4G and accompanying descriptions; 2:50–52; 4:46–56, 59–67; 5:14–24, 27–37; 5:38–55; 6:1–15; 6:25–33; 7:10–13; 8:65–19:60. 10/316,961, Response to Office Action dated June 5, 2006 at 21-23; 10/316,961, Response to Office Action dated Nov. 14, 2006 at 26-36; 10/316,961, Response to Office Action / Request for Continued Examination dated June 28, 2006 at	Judge Payne’s Claim Construction Memorandum Opinion and Order, Dkt. 109, in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Case No. 2:17-cv-00421-JRG-RSP, as well as all briefing and evidence referred to therein. Blitzsafe may rely on the expert testimony of Mr. Joseph McAlexander in connection with this claim term.

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Patent Rule 4-3 Joint Claim Construction Chart

No.	Claim Term/Phrase	Patent/Claims	Blitzsafe’s Proposed Construction	Intrinsic Support ¹	Extrinsic Support
			microcontroller, resistors, diodes, capacitors, oscillators and connectors shown in Figures 3A-3D, executing the algorithms shown in Figure 4B and described at 13:1-48, and the algorithm described at 18:5-61, and equivalents thereof.	26-38; 10/316,961, Response to Office Action dated July 12, 2007 at 29-37; 10/316,961, Response to Office Action / Request for Continued Examination dated Feb. April 21, 2008 at 29-34; Notice of Allowance dated July 31, 2008	